BEFORE THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

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In the Matter of the Complaint Against KCP&L by Stephen and Karen Gradwohl.

Docket No. 15-KCPE-544-COM

MOTION FOR EXTENSION OF DEADLINE

COMES NOW the Staff of the State Corporation Commission of the State of Kansas (Staff and the Commission, respectively), and respectfully request the Commission extend Staff's deadline to a responsive pleading until December 10, 2015. In support of this motion, Staff states as follows:

I. Background

1. On May 15, 2015, Stephen and Karen Gradwohl (Complainants) filed a Formal Complaint with the Commission against Kansas City Power & Light Company (KCP&L).

2. On June 11, 2015, KCP&L filed an Answer and Motion to Dismiss.

3. On September 28, 2015, Staff filed its Report and Recommendation (R&R) in this matter. In its R&R, Staff concludes KCP&L provided inaccurate markings of facilities it operates, which constituted a violation of the Kansas Underground Utility Damage Prevention Act (KUUDPA).¹

4. On October 7, 2015, KCP&L requested a 30-day extension of its deadline to respond to Staff's R&R. The Commission granted KCP&L's request on October 13, 2015.

5. On November 9, 2015, KCP&L requested an additional 10-day extension of its deadline to respond to Staff's R&R.² The Commission granted KCP&L's request for a second deadline extension on November 24, 2015.

¹ K.S.A. 66-1801, et seq; Staff R&R, pp. 4-5.

² Staff did not object to either of KCP&L's requests for additional time to respond.

6. On November 19, 2015, KCP&L filed its Response to Staff's Report and Recommendation.

II. Staff's Motion for Extension of Deadline

7. Pursuant to K.A.R. 82-1-218, a pleading in response to KCP&L's Response would be due Monday, November 30, 2015. However, the Commission's rules also allow it to extend regulatory deadlines such as this for good cause shown.³

8. Due to employee absences, the intervening holiday, and the press of other business, Staff is unable to fully review, consider, and potentially respond to KCP&L's filing within the timeframe described above. Therefore, Staff requests a 10-day extension of its deadline to file a responsive pleading to Thursday, December 10, 2015.

9. Staff does not believe any party will be prejudiced by this accommodation. Further, counsel for KCP&L has indicated the company does not object to Staff's request.

WHEREFORE, Staff respectfully requests the Commission grant its request for a 10-day extension of its deadline to file a responsive pleading to Thursday, December 10, 2015.

Respectfully submitted,

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³ K.A.R. 82-1-217(b).

CERTIFICATE OF SERVICE

15-KCPE-544-COM

I, the undersigned, certify that a true and correct copy of the above and foregoing Motion for Extension of Deadline was served by electronic service on this 24th day of November, 2015, to the following:

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